RIC 2004

Licensing Issues – Session W6

Licensing-Process Improvement

Today → **Next Year** → **Next 3** years

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March 10, 2004



Objective

- Improve licensing-process stability and predictability through:
 - † effectiveness & efficiency
 - † efforts to identify & prioritize process issues
 - † coordination within the licensing community
 - † public communications



Key Factors

- Today's experience becomes tomorrow's process
- Continual change is inevitable
- Need licensing stability & predictability
 while managing change



Licensing Change Management

- Use the existing Licensing Community to:
 - Establish baseline principles
 - Identify emerging licensing-process issues
 - Establish priorities
 - Standardize



Licensing Community

 Standardizing change management rests with the Licensing Community

·Licensees ·NSSS vendors ·NRC ·Public

•Owners Groups •Architect/Engineers •NEI •EPRI

•Special Issue Groups •Consultants •INPO

•Standards •Regional Utility

organizations Groups



Establish Baseline Principles

- Use the NRC's Principles of Good Regulation, which include:
 - Independence (licensing community of independent contributors)
 - Open (public meetings; PDR; ADAMS)
 - Efficient (standardize; reduce duplication & overlap)
 - Clear (written problem statements; white papers)
 - Reliable (peer review)



Identify Emerging Licensing-Process Issues

- Problem Statement
 - If you can't write it down, you don't have a problem.
- Draft "white paper"
 - Mutual understanding
 - Industry and NRC peer review
- Timely, public resolution
- Final "white paper" to document resolution and request regulatory "endorsement"



Establish Priorities

- Identify important factors
 - cost factors
 - value added
 - likelihood of regulatory success
 - timing
- Use a consistent methodology
- Continual feedback & refinement



Standardize

- Work within the existing licensing framework
- Avoid duplication & overlap
- Format templates
 - License Amendment Requests (LARs)
 - Relief Requests (10 CFR 50.55a)



Simplified Flow Chart

Licensee, Industry Group, or NRC Drafts a Problem Statement

NRC Staff Options

Information Notice, initiate research (RES; National Labs), Office Instructions, Management Directives, Inspection Manual, Project Managers' Handbook, Regulatory Guides, CRGR Charter, Regulatory Issue Summary, Generic Safety Issue, 50.54(f) information request (oath or affirmation; to enable a licensing decision), Generic Letter, Bulletin, CLIIP, STS change, NOED, backfit, orders, rulemaking.

Industry Options

Reports, Codes & Standards, compensatory action (50.59; corrective action program), GL 91-18 operability determination (corrective action program), commitment, 50.59 change to LB/DB/FSAR, Topical Report, NOED request, TSTF Traveler, 50.90 LAR, white paper, guideline, 50.12 exemption, 50.55a relief, petition for rulemaking.

Public Meetings & Correspondence

- 1. Resolution Plan
- 2. Endorsement
- 3. Action Items

4. Schedule

5. Implement

6. Document

7. Inspection/Oversight



Next Steps

Two pilot white papers:

- "Use of the Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability," 10/22/03
- "ISA S67.04 Methods for Determining Trip Setpoints and Allowable Values for Safety-Related Instrumentation," 12/5/03

Comments via:

- Industry WebBoard (http://webboard.nei.org/~LATF)
- NRC/NEI Licensing Action Task Force steering group meetings
- NRC/NEI correspondence
- Annual Licensing Forum

